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UNITED STATES DISTRICT COURT**DISTRICT OF NEVADA**

MARIAH MAAS, as Special Administrator for
 the Estate of Tiffany Slatsky, MARTIN
 SLATSKY, as parent and legal guardian of
 CADE SLATSKY, a minor;

Plaintiffs,

vs.

CHRISTOPHER CANDITO, an individual;
 ANDREW CLAPPER, an individual;
 NICHOLAS ROBISON, an individual;
 ANDREW STOCKER, an individual; STEVEN
 HONSOWETZ, an individual; CITY OF
 NORTH LAS VEGAS, a municipality; NORTH
 LAS VEGAS FIRE DEPARTMENT, a City of
 North Las Vegas agency; GNLV, LLC dba
 GOLDEN NUGGET HOTEL & CASINO, a
 Domestic Limited-Liability Company;
 DOMAIN PROPERTY OWNER LLC; a
 Foreign Limited-Liability Company; OAKTREE
 CAPITAL MANAGEMENT L.P.; a Foreign
 Limited Partnership; DOE DEFENDANTS I
 through XX, and ROE CORPORATIONS I
 through X, inclusive,

CASE NO.: 2:22-cv-568-DJA

STIPULATION AND ORDER TO EXTEND
DISCOVERY DEADLINES

(SECOND REQUEST)

1 Defendants.

2 AND ALL RELATED CLAIMS.

3
4 IT IS HEREBY STIPULATED AND AGREED between the parties and their undersigned
5 attorneys¹ that the discovery cut-off date of August 1, 2023, be continued for a period of one
6 hundred and twenty (120) days from the Court's prior Order (ECF No. 54), up to and including
7 **November 29, 2023**, for the purpose of allowing the parties to complete written discovery, complete
8 the depositions of the remaining parties, experts, and lay witnesses, and any other discovery the
9 parties wish to conduct.

10 **I. DISCOVERY COMPLETED TO DATE**

- 11 • Plaintiffs served their initial disclosures on July 20, 2022. Defendants Nicholas Robison,
- 12 GNLV LLC, and Domain Property Owner LLC, served their initial disclosures on July
- 13 20, 2022. Defendants City of North Las Vegas and The North Las Vegas Fire
- 14 Department served their initial disclosures on July 22, 2022. Defendants Andrew Clapper
- 15 and Steven Honsowetz served their initial disclosures on August 19, 2022. Defendant
- 16 Andrew Stocker served his initial disclosures on August 23, 2022. Plaintiffs served their
- 17 first supplemental disclosure on September 20, 2022. Defendant Domain Property
- 18 Owner, LLC served their amended initial disclosures and first supplemental disclosure on
- 19 September 28, 2022. Plaintiffs served their second supplemental disclosure on September
- 20 28, 2022. Defendant Steven Honsowetz served his first supplemental disclosure on
- 21 September 30, 2022. Defendant Nicholas Robison served his first supplemental
- 22 disclosure on October 14, 2022. Defendant GNLV LLC served their amended initial
- 23 disclosures and first supplemental disclosure on October 14, 2022. Defendant CNLV
- 24 served their first supplemental disclosure on November 18, 2022. Defendant Stocker
- 25 served his first supplemental disclosure on December 8, 2022. Plaintiffs served their third
- 26 supplemental disclosure on January 6, 2023, their fourth supplemental disclosure on

27
28 ¹ Oak Tree Capital Management, L.P. was dismissed on June 29, 2022 (ECF. 34), Domain Property Owner LLC was
dismissed on November 14, 2022 (ECF 51), and GNLV, LLC was dismissed on February 17, 2023 (ECF 70).

January 19, 2023, their fifth supplemental disclosure on February 6, 2023, their sixth supplemental disclosure on March 3, 2023, and their seventh supplemental disclosure on March 13, 2023. Defendants CNLV and CNLVFD served their second, third, and fourth supplemental disclosure on April 4, 2023. Plaintiffs served their eighth supplemental disclosure on April 6, 2023.

- On August 31, 2022, Plaintiffs served their first set of Interrogatories and Request for Production of Documents to all Defendants.
- On September 7, 2022, Plaintiffs Noticed the Depositions of Defendants Clapper, Honsowetz, Stocker, and Robison.
- On September 8, 2022, Plaintiffs served the Henderson Police Department with a Subpoena *Duces Tecum*. The documents were received on September 19, 2022, and supplemented to all parties.
- On September 9, 2022, Plaintiffs served the Clark County Coroner / Medical Examiner with a Subpoena *Duces Tecum*. The documents were received on September 14, 2022, and supplemented to all parties.
- On September 9, 2022, Plaintiffs served the Las Vegas Nevada DEA's Office with a Subpoena *Duces Tecum*. The Las Vegas DEA Office asked for a thirty (30) day extension on September 15, 2022, and a two (2) week extension on October 20, 2022. No documents were produced in response to the Subpoena *Duces Tecum*.
- On September 29, 2022, Domain Property Owner LLC served their responses to Plaintiffs' first set of discovery requests.
- On September 30, 2022, Defendant Steven Honsowetz served his responses to Plaintiffs' first set of discovery requests.
- On October 14, 2022, Defendants GNLV LLC and Nicholas Robison served their responses to Plaintiffs' first set of discovery requests.
- On November 1, 2022, Defendant Andrew Stocker served his responses to Plaintiffs' first set of discovery requests.

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- On November 3, 2022, Plaintiffs served their *Request for Entry Upon Land for Inspection and Other Purposes* to inspect Suite 5655 at The Golden Nugget Hotel and Casino.
- On November 4, 2022, Defendants CNLV and The North Las Vegas Fire Department served their first set of Interrogatories, Requests for Admissions, and Requests for Production of Documents to Plaintiffs and Defendants Clapper and Honsowetz.
- On November 4, 2022, Plaintiffs served the Division of Counsel for the DEA with an Amended Subpoena *Duces Tecum*. The documents were received on December 23, 2022, and supplemented to all parties.
- On November 4, 2022, Plaintiffs served the Las Vegas Metropolitan Police Department with a Subpoena *Duces Tecum*.
- On November 10, 2022, Plaintiffs served the Las Vegas Metropolitan Police Department with an Amended Subpoena *Duces Tecum*.
- On November 28, 2022, Defendant Clapper served his responses to Plaintiff's first set of Interrogatories and Request For Production of Documents.
- On December 5, 2022, Defendant Honsowetz served his responses to CNLV's first set of Interrogatories, Requests for Admissions, and Requests for Production of Documents.
- On December 7, 2022, Defendant Honsowetz served his first supplemental responses to CNLV's first set of Requests for Production of Documents.
- On December 22, 2022, Plaintiffs served their First Amended Deposition Notices to Defendants Steven Honsowetz, Andrew Stocker, Nicholas Robison, and Andrew Clapper.
- On January 6, 2023, Plaintiffs served their responses to CNLV's First Set of Interrogatories, Requests for Admission, and Requests for Production of Documents.
- On January 23, 2023, Plaintiffs served their Second Amended Deposition Notice to Defendant Andrew Stocker.
- On February 7, 2023, Plaintiffs took the videotaped deposition of Defendant Steven Honsowetz.
- On February 9, 2023, Plaintiffs' served their Second Amended Deposition Notice to Defendant Nicholas Robison.

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- On February 9, 2023, Plaintiffs took the videotaped deposition of Defendant Andrew Stocker.
- On February 16, 2023, Plaintiffs served their First Set of Requests for Production of Documents to Defendant CNLVFD.
- On February 16, 2023, Plaintiffs served their Second Set of Requests for Production of Documents to Defendants Candito, Clapper, Honsowetz, Robison, Stocker, and CNLV.
- On February 24, 2023, Plaintiffs served their Deposition Notice to Irina Hansen.
- On March 3, 2023, Plaintiffs served their Third Amended Deposition Notice to Defendant Nicholas Robison.
- On March 13, 2023, Plaintiffs served their Third Set of Requests for Production of Documents to Defendant CNLV.
- On March 14, 2023, Plaintiffs served their Deposition Notice to Defendant Christopher Candito.
- On March 14, 2023, Plaintiffs served their Second Amended Deposition Notice to Defendant Andrew Clapper.
- On March 15, 2023, Plaintiffs' served Micha Reyes with an Subpoena *Duces Tecum*.
- On March 16, 2023, Defendant Honsowetz and Clapper served thier responses to Plaintiffs' Second Set of Requests for Production of Documents.
- On March 17, 2023, Defendant Robison served his responses to Plaintiffs' Second Set of Requests for Production of Documents.
- On March 20, 2023, Defendant Stocker served his responses to Plaintiffs' Second Set of Requests for Production of Documents.
- On March 22, 2023, Plaintiffs served the International Association of Fire Fighters Local 1607 with an Subpoena *Duces Tecum*. The documents were received on March 23, 2023, and supplemented to all parties
- On March 24, 2023, Plaintiffs served their Fourth Amended Deposition Notice to Defendant Nicholas Robison.

- On April 4, 2023, Defendant CNLV served their responses to Plaintiffs Second Set of Requests for Production of Documents.
- On April 12, 2023, Defendant CNLV served their responses to Plaintiff's Third Set of Requests for Production of Documents.

II. DISCOVERY YET TO BE COMPLETED

The Parties have yet to complete the following discover (individual or 30(b)(6) designees);

- the depositions of the remaining named parties;
- the depositions of fact witnesses;
- subpoenas *duces tecum* and the depositions of third party percipient witnesses;
- inspection of items and land pursuant to FRCP 34;
- expert witness disclosures and expert witness depositions;
- additional written discovery which may include written discovery to one another and/or additional subpoenas to third parties; and
- Any additional discovery the parties wish to conduct.

The Parties reserve the right to conduct additional discovery that is permitted by the Federal Rules of Civil Procedure.

III. REASONS WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED

While the parties have been diligent in conducting discovery in this matter, the following issues have been unavoidable:

This case involves multiple parties and coordinating deposition dates that work with all parties has been challenging. At this time, there have been approximately 10,000 documents, seven hundred and fifty (750) photos, and eleven (11) hours of video that have been produced. Due to the large volume of documents produced, the parties are in the process of completing a thorough document review, responding to written discovery, and properly preparing for depositions.

Additionally, Counsel for Defendant Clapper has suffered severe injuries from an accident and is required to be on bed rest for multiple weeks.

Plaintiffs' Counsel has also been called away from the office due to an immediate family member's medical issue. Counsel will be required to spend significant time away from the office in

the foreseeable future which has required multiple extended hospital visits, and extended medical care. The medical situation is ongoing. This has significantly hindered the parties' ability to complete and conduct the necessary discovery in this case within the current deadline.

IV. PROPOSED EXTENDED DEADLINES

	<u>Current</u>	<u>Proposed</u>
Discovery cut-off	8/1/23	Wednesday, November 29, 2023
Deadline to amend pleadings and add parties	5/3/23	Thursday, August 31, 2023
Deadline for initial expert disclosures	6/2/23	Monday, October 2, 2023 ²
Deadline for rebuttal expert disclosures	7/5/23	Wednesday, November 2, 2023
Deadline to file dispositive motions	8/31/23	Friday, December 29, 2023
Deadline to file pre-trial order	10/2/23	Tuesday, January 30, 2024 or 30 days after the dispositive motions have been decided.

² This deadline falls on September 30, 2023, which is a Saturday. As a result, this deadline extends to the next court day, Monday October 2, 2023, by operation of FRCP.

This request for an extension is made in good faith and joined by all the parties in this case. The Request is timely pursuant to LR 26-3. Trial is not yet set in this matter and dispositive motions have not yet been filed. Accordingly, this extension will not delay this case. Since this request is a joint request, no party will be prejudiced. The extension will allow the parties the necessary time to complete discovery.

IT IS SO STIPULATED AND AGREED.

DATED this 26th day of April, 2023.

DATED this 26th day of April, 2023.

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LAW OFFICE OF DANIEL MARKS

/s/ Andre Lagomarsino

/s/ Adam Levine

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DATED this 26th day of April, 2023.

DATED this 26th day of April, 2023.

LEWIS BRISBOIS BISGAARD & SMITH

THE LAW OFFICES OF KRISTINA WILDEVELD AND ASSOCIATES

/s/ Robert Freeman

/s/ Lisa Rasmussen

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DATED this 26th day of April, 2023.

DATED this 26th day of April, 2023.

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/s/ Raymond Gates

/s/ Nicholas Adams

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1 DATED this 26th day of April, 2023.

2 **CHRISTOPHER CANDITO**

3 /s/ Christopher Candito

4 *Pro Se*

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6 IT IS SO ORDERED that the parties' Stipulation to Extend Discovery Deadlines
(ECF No. 71) is GRANTED.

7 DATED this 27th day of April, 2023.

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9 

10 DANIEL J. ALBREGTS

11 UNITED STATES MAGISTRATE JUDGE

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